

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

NATHAN ROBERTS and FREEDOM  
TRUCK DISPATCH LLC, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

*v.*

PROGRESSIVE PREFERRED INSURANCE  
COMPANY; PROGRESSIVE CASUALTY  
INSURANCE COMPANY; CIRCULAR  
BOARD LLC,

*Defendants.*

Civil Action No. 1:23-cv-01597

JUDGE PATRICIA A. GAUGHAN  
Magistrate Judge James E. Grimes, Jr.

**MOTION FOR THE ADMISSION,  
*PRO HAC VICE*, OF JENNIFER VAIL  
AS COUNSEL FOR *AMICI CURIAE***

Pursuant to Local Civil Rule 83.5(h), I hereby move for the admission, *pro hac vice*, of Jennifer Vail, an attorney at the Southern Poverty Law Center located at 1101 17<sup>th</sup> Street NW, Suite 705, Washington, D.C. 20036, and a member in good standing of the District of Columbia bar (D.C. Bar No. 90004758, admitted on October 31, 2022), as counsel in this case for *Amici Curiae* the Southern Poverty Law Center, the National Hispanic Bar Association, and Asian Americans Advancing Justice. I have never been disbarred or suspended from practice before any court, department, bureau or commission of any State or the United States. I have never received a reprimand from any such court, department, bureau, or commission pertaining to conduct or fitness as a member of the bar. A Certificate of Good Standing is filed herewith.

Date: December 21, 2023

Respectfully submitted,

*s/Jennifer Vail*

Jennifer Vail (DC Bar No. 90004758)  
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**CERTIFICATE OF SERVICE**

I certify that, on December 21, 2023, I electronically transmitted the attached MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF JENNIFER VAIL AS COUNSEL FOR *AMICI CURIAE*, its accompanying Certificate of Good Standing, and proposed order using the CM/ECF system. Notice of Electronic Filing will be sent to all CM/ECF registrants for this matter.

Respectfully submitted,

s/ Jennifer Vail

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*Attorney for Amici Curiae The Southern Poverty Law Center, Hispanic National Bar Association, and Asian Americans Advancing Justice – AAJC*